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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: _____

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2014 Grand Jury

CR 14-0212

UNITED STATES OF AMERICA,

CR No.

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. §§ 1832(a)(2),
(a)(4): Unauthorized
Transmission and Attempted
Transmission of Trade Secrets;
18 U.S.C. §§ 1832(a)(3), (a)(4):
Unauthorized Possession and
Attempted Possession of Trade
Secrets]

DEREK WAI HUNG TAM SING,
aka "ceven1073,"
aka "chuckeven8,"

Defendant.

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. From on or about April 30, 2012, until his termination on or about November 28, 2012, in Los Angeles County, within the Central District of California, defendant DEREK WAI HUNG TAM SING, also known as ("aka") "ceven1073," aka "chuckeven8" ("defendant" or "SING"), worked for Rogerson Kratos as a power supply engineer, specializing in analog work. In order to perform his required duties at Rogerson Kratos, defendant SING had access to Rogerson Kratos proprietary information, including trade secrets.

1 2. At all times relevant to this Indictment, defendant
2 SING was the user of the email account "ceven1073@gmail.com."

3 3. At all times relevant to this Indictment, Rogerson
4 Kratos designed, manufactured, and supplied aerospace products,
5 including display units for various aircraft, and maintained its
6 headquarters in Los Angeles County, within the Central District
7 of California.

COUNTS ONE THROUGH THIRTY-SIX

[18 U.S.C. §§ 1832(a)(2), (a)(4)]

4. The Grand Jury repeats and re-alleges paragraphs 1 through 3 of this Indictment as if fully set forth herein.

5. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant DEREK WAI HUNG TAM SING, also known as ("aka") "ceven1073," aka "chuckeven8" ("defendant" or "SING"), with intent to convert a trade secret that was related to a product used in or intended for use in interstate and foreign commerce, to the economic benefit of someone other than Rogerson Kratos, and knowing and intending that the offense would injure Rogerson Kratos, knowingly and without authorization transmitted, sent, mailed, communicated, and conveyed, and attempted to send, mail, communicate, and convey, the following Rogerson Kratos trade secrets:

| COUNT | DATE | TRANSMISSION METHOD | TRADE SECRET |
|-------|--------------|--|--|
| ONE | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A." |
| TWO | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E" |

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| THREE | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F" |
| FOUR | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B" |
| FIVE | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635-0160-1, Rev. C" |
| SIX | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J" |
| SEVEN | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:44 pm, to [m.s.]@aspenavionics.com | A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)" |
| EIGHT | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:44 pm, to [m.s.]@aspenavionics.com | A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924" |

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| NINE | Jan. 9, 2013 | Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com | A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635-0389, Rev. C" |
| TEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A." |
| ELEVEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E" |
| TWELVE | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F" |
| THIRTEEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B" |
| FOURTEEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635-0160-1, Rev. C" |
| FIFTEEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J" |

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| SIXTEEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)" |
| SEVENTEEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924" |
| EIGHTEEN | Jan. 14, 2013 | Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com | A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635- 0389, Rev. C" |
| NINETEEN | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A." |
| TWENTY | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635- 0343-2, Rev. E" |
| TWENTY- ONE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F" |

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| TWENTY-TWO | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B" |
| TWENTY-THREE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635-0160-1, Rev. C" |
| TWENTY-FOUR | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J" |
| TWENTY-FIVE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)" |
| TWENTY-SIX | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924" |
| TWENTY-SEVEN | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico | A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635-0389, Rev. C" |

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| 1 | TWENTY-EIGHT | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A." |
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| 5 | TWENTY-NINE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E" |
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| 9 | THIRTY | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F" |
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| 14 | THIRTY-ONE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B" |
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| 18 | THIRTY-TWO | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635-0160-1, Rev. C" |
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| 21 | THIRTY-THREE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J" |
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| THIRTY- FOUR | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)" |
| THIRTY- FIVE | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924" |
| THIRTY- SIX | Jan. 2013 | EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio | A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635- 0389, Rev. C" |

COUNTS THIRTY-SEVEN THROUGH FORTY-TWO

[18 U.S.C. §§ 1832(a)(3), (a)(4)]

6. The Grand Jury repeats and re-alleges paragraphs 1 through 3 of this Indictment as if fully set forth herein.

7. Beginning on or about November 29, 2012, and continuing to on or about February 14, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendant DEREK WAI HUNG TAM SING, also known as ("aka") "ceven1073," aka "chuckeven8" ("defendant" or "SING"), with intent to convert a trade secret that was related to a product used in or intended for use in interstate and foreign commerce, to the economic benefit of someone other than Rogerson Kratos, and knowing and intending that the offense would injure Rogerson Kratos, knowingly possessed, and attempted to possess, the following Rogerson Kratos trade secrets knowing them to have been stolen, and appropriated, obtained, and converted without authorization:

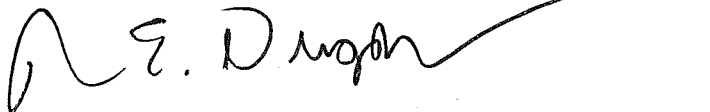
| COUNT | TRADE SECRET |
|--------------|--|
| THIRTY-SEVEN | A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A." |
| THIRTY-EIGHT | A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E" |
| THIRTY-NINE | A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B" |
| FORTY | A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J" |

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| FORTY-ONE | A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)" |
| FORTY-TWO | A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924" |

A TRUE BILL

151
Foreperson

ANDRÉ BIROTTE JR.
United States Attorney



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